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Attorneys for Defendants

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON

CENTER FOR BIOLOGICAL DIVERSITY;
CASCADIA WILDLANDS; PACIFIC
COAST FEDERATION OF FISHERMEN'S
ASSOCIATIONS; INSTITUTE FOR
FISHERIES RESOURCES; NATIVE FISH
SOCIETY,

Plaintiffs,

v.

PETER DAUGHERTY, in his official
capacity as Oregon State Forester;
KATHERINE SKINNER, in her official
capacity as District Forester for the Tillamook
District; MICHAEL CAFFERATA, in his
official capacity as District Forester for the
Forest Grove District; DANIEL GOODY, in
his official capacity as District Forester for the
Astoria District,

Defendants.

Case No. 6:18-cv-1035-JR


DECLARATION OF TOD HAREN IN
SUPPORT OF DEFENDANTS' MOTION TO
STRIKE

1. My name is Tod Haren. I am employed by the Oregon Department of Forestry. My title is Forest Resource Analyst. My job duties include modeling, analysis, and reporting on forest inventory and associated data pertaining to the management of the State Forests.

2. I have reviewed paragraph 113 of the Complaint in the above-captioned case, and its associated photographs, and compared them to maps of State Forests Lands. The GPS coordinates shown on these photographs show that the landslides pictured in them are on private land outside of ODF ownership.

I declare under penalty of perjury that the foregoing is true and correct.

EXECUTED on August 24, 2018.



TOD HAREN

CERTIFICATE OF SERVICE

I certify that on August 24, 2018, I served the foregoing DECLARATION OF TOD HAREN IN SUPPORT OF DEFENDANTS' MOTION TO STRIKE upon the parties hereto by the method indicated below, and addressed to the following:

Oliver J. Stiefel
Crag Law Center
917 SW Oak St., Ste. 417
Portland, OR 97205

*Of Attorneys for Plaintiffs Center for
Biological Diversity, Cascadia
Wildlands, Pacific Coast Federation of
Fishermen's Associations, Institute for
Fisheries Resources, and Native Fish
Society*

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☐ MAIL DELIVERY
☐ OVERNIGHT MAIL
☒ E-SERVE

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*Of Attorneys for Plaintiff Cascadia
Wildlands*

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___ MAIL DELIVERY
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s/ Sarah Weston

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